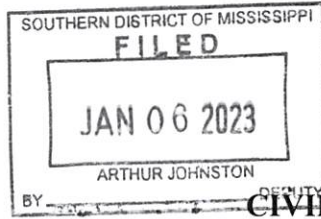


**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
EASTERN DIVISION**

**VANESSA J JONES
DBA JONES LAW FIRM**

PLAINTIFF

V.



CIVIL ACTION NO.: 2:23-cv-3-HSO-BWR

**HIGH RISE FINANCIAL LLC,
AND
MICHAEL MACKIE, INDIVIDUALLY**

DEFENDANTS

COMPLAINT

COMES NOW Vanessa J Jones, DBA Jones Law Firm, Plaintiff in the above-styled and numbered cause, and files this her Complaint against Defendants, High Rise Financial, LLC and agent, Michael Mackie, Individually, and in support thereof would show unto the Court the following matters and facts.

1. Plaintiff, Vanessa J Jones, DBA Jones Law Firm is an adult resident citizen and business owner located at 6088 U.S. Highway 49, Hattiesburg, Forrest County, Mississippi.
2. High Rise Financial LLC is a Delaware limited liability company, with its principal place of business in California at 11110 Ohio Avenue #207, Los Angeles, CA 90025. High Rise Financial LLC may be served with process and other writs of this Court through its agent for process PARACORP INCORPORATED 2804 Gateway, Oaks Drive #100, Sacramento, CA 95833.
3. After a search of the secretary of state's business listings in Delaware and California, There are two (2) founders and members of High Rise Financial LLC. (1) Michael Berookim, a California resident, with a domicile of 1506 Blue Jay Way, Los Angeles, CA 90069 and a

business address is 11110 Ohio Avenue, Ste 207, Los Angeles, CA 90025. (2) Mark Berookim is a California resident with a domicile in Beverly Hills, CA and a business address 11110 Ohio Avenue, Ste 207, Los Angeles, CA 90025.

4. Michael Mackie is an agent of High Rise Financial 11110 Ohio Avenue #207, Los Angeles, CA 90025. Upon the best information obtained, Mackie is a California resident who is domiciled in Long Beach, CA. No information has been found to show that he is a resident of the State of Mississippi. He may be served with process and other writs of this Court at PARACORP INCORPORATED 2804 Gateway, Oaks Drive #100, Sacramento, CA 95833 or wherever he may be found.

5. This defamation suit arises from an intentional fabricated and false statement. On March 16, 2022, High Rise Financial LLC's agent, Michael Mackie, wrote the following about Vanessa J. Jones, DBA Jones Law Firm to The Mississippi Bar, "PLAINTIFF IS NOT RESPONDING EITHER, WE BELIEVE ON ADVICE FROM ATTORNEY VANESSA JONES."

6. Said writing contained the following false and defamatory matter: "PLAINTIFF IS NOT RESPONDING EITHER, WE BELIEVE ON ADVICE FROM ATTORNEY VANESSA JONES."

7. The false written statements were delivered by High Rise Financial LLC's agent Michael Mackie to The Mississippi Bar, located at Post Office Box 2168, Jackson, Mississippi, Hinds County, to be read by the Office of General Counsel. The writing was in fact read by such person and others.

8. In making the defamatory communication, Defendant's agent intended to present Jones in a false light to result in criticism, dishonor and condemnation of Jones by The Mississippi Bar.

As a direct result of High Rise Financial LLC and its' agent Michael Mackie's false defamatory allegation, Jones has suffered severe professional, personal and emotional harm.

JURISDICTION AND VENUE

9. This Court has subject matter jurisdiction over this suit pursuant to 28 U.S.C. Section 1332(a) as there exists complete diversity of citizenship between the Plaintiff and Defendants and the amount in controversy exceeds \$75,000.00, exclusive of interest and costs.

10. High Rise Financial LLC is subject to personal jurisdiction in Mississippi because it transacts business in Mississippi. It's agent, Michael Mackie, knowingly, and with reckless disregard for the truth, published written false and defamatory statements concerning Vanessa J Jones DBA Jones Law Firm, 6088 U. S. Highway 49, Hattiesburg, MS, Forrest County, to The Mississippi Bar.

11. Michael Mackie is subject to personal jurisdiction in Mississippi because he is an agent of High Rise Financial LLC who transacts business in Mississippi. Michael Mackie knowingly, and with reckless disregard for the truth, published false and defamatory statements concerning Vanessa J Jones DBA Jones Law Firm, 6088 U. S. Highway 49, Hattiesburg, MS, Forrest County, to The Mississippi Bar.

COUNT ONE – DEFAMATION

12. Plaintiff repeats and re-alleges each of the foregoing paragraphs as if fully set forth herein.

13. High Rise Financial LLC and Michael Mackie, its agent, writing the false statement to the Mississippi Bar is defamatory per se as to Vanessa J. Jones DBA Jones Law Firm. High Rise Financial, LLC through its agent, Michael Mackie, impute that Vanessa J. Jones DBA Jones Law

Firm is dishonest. The false written statement was intended to injure Jones in her profession as an attorney.

14. As a direct and proximate result of High Rise Financial LLC and its agent, Michael Mackie's actions, Jones' professional reputation has been damaged and she has suffered severe emotional and mental distress.

15. High Rise Financial LLC and its agent, Michael Mackie's actions were malicious, willful, and wanton, and evidence a conscious disregard for the rights of Vanessa J. Jones DBA Jones Law Firm. Accordingly, punitive damages are appropriate.

COUNT TWO – BREACH OF ARBITRATION AGREEMENT

16. On June 14, 2018, High Rise Financial, LLC and Vanessa J Jones entered into an Attorney Acknowledgment Contract. The parties contracted that "all disputes arising out of this transaction involving me and my law firm will be resolved via arbitration with Arbitration Resolution Services based on their rules at www.arbresolutions.com per the Non-Recourse Purchase Agreement and the Irrevocable Letter of Directions. The prevailing party will be entitled to all legal fees and costs."

17. On March 16, 2022, High Rise Financial, LLC by and through its agent, Michael Mackie, breached this Arbitration Contract by filing a Complaint with the Mississippi Bar without first submitting the matter to arbitration pursuant to its own contract.

18. As a result of this breach, Vanessa J Jones DBA Jones Law Firm professional reputation has been damaged and she has suffered severe emotional and mental distress.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff, Vanessa J Jones DBA Jones Law Firm demands judgment against High Rise Financial, LLC and Michael Mackie, jointly and severally, as follows:

- (a) awarding compensatory damages of not less than one million dollars (\$1,000,000);
- (b) awarding punitive damages;
- (c) awarding all expenses and costs, including attorneys' fees;
- (d) an injunction prohibiting the Defendants from writing any statements that are judicially determined to be defamatory;
- (e) an Order directing Arbitration and
- (f) such other and further relief as the Court deems appropriate.

A JURY TRIAL IS DEMANDED

Dated: January 6, 2023

Respectfully Submitted,

By: 

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